

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>MICHELLE WHALEN, on behalf of</b>	:	
<b>herself and those similarly situated,</b>	:	
Plaintiff,	:	Case No. 1:17-cv-02092
v.	:	Judge James S. Gwin
<b>DEGROFF INDUSTRIES, INC., et al.,</b>	:	
Defendants.	:	
	:	
	:	

**STIPULATED MOTION FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S  
COMPLAINT OR OTHERWISE PLEAD**

NOW COME Defendants Degroff Industries, Inc., Lavendar Farms, LLC, Ronald Larson and Kim Larson (collectively "Defendants") and move this Honorable Court for an order granting them a twenty five (25) day extension of time (up to and including December 4, 2017) to answer Plaintiff's First Amended Complaint and to file any other responsive pleadings/motions.

Plaintiff served her First Amended Complaint on October 26, 2017. The current deadline to respond to the First Amended Complaint is November 9, 2017. With the extension, the deadline for Defendants to answer and to file any other responsive pleadings/motions shall be December 4, 2017. Plaintiff agreed to this extension of time on October 26, 2017.

This motion is made in good faith and not for purposes of delay. Rather, given the nature and complexity of this action, Defendants need additional time to research Plaintiff's claims, investigate the facts of the case and to prepare their answer and any responsive pleadings/motions. Given the nascent stage of this litigation and the fact that Plaintiff agrees to the extension of time, the Parties will suffer no prejudice by this reasonable extension of time.

This is the first request for an extension of time to answer or otherwise plead filed in connection with this case.

WHEREFORE Defendants respectfully request that this Court grant them a 25 day extension of time - - up to and including December 4, 2017 to file their answer and any other responsive pleadings/motions.

Respectfully submitted,

/s/ Eric Kmetz

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Attorneys for Defendants  
DEGROFF INDUSTRIES, INC., LAVENDER FARMS, LLC, RONALD LARSON and KIM LARSON

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2017, a copy of the foregoing *Stipulated Motion for Extension of Time to Answer Plaintiff's Complaint or Otherwise Plead* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ James P. Smith

James P. Smith

One of the Attorneys for Defendants  
DEGROFF INDUSTRIES, INC., LAVENDER  
FARMS, LLC, RONALD LARSON and KIM  
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